

Correspondence

DEPT. OF TRANSPORTATION
DOCKET SECTION

96 NOV -4 AM 11:35



ACTION	
is assigned to	
<i>C</i>	
CONTROL NO.	
961022-003	
SIMS	S-10

12963
QA

Beirut 28/9/1996

Ref APS/315 /96

DST- 95- 950-38

Mr. Frederico Pena
Secretary of Transportation
Docket #
U.S. Department of Transportation
400 7th Street, SW
Room 4107
Washington, D.C. 20590
USA

Dear Mr. Secretary,

I would like to refer to the NPRM issued on 10 September 1996 in the "Federal Register " concerning the Passenger Manifest.

The Arab Air Carriers Organization is very much concerned with the requirements stipulated in the NPRM with regard to the Non-US airlines. While we appreciate the intent for having passengers information easily and promptly available to the authorities in case of an aircraft accident, yet we anticipate considerable practical difficulties in collecting such information and consequently in the implementation of the NPRM in question.

In fact, there are certain legal and handling problems which we would like to highlight for your consideration. From a legal point of view, most countries of the world do not have such requirements and the passenger manifest had been eliminated due to various reasons. Hence, the airlines are in no position to demand and introduce a procedure that is not approved basically by those governments who comply fully with ICAO standards. It is felt that US requirements should be channeled through

TEL.: 861297/8/9 - SITA: BEYXAXB - FAX: 603140
P.O.BOX: 13-5468 - BEIRUT - LEBANON

3 pages

FAX96.DOC

ICAO so that a unanimous governmental approval is obtained to enable the airlines comply accordingly. Needless to emphasize that the NPRM will not be imposed on other modes of transport, and as such, airlines will be at a disadvantage in this respect.

On the other hand, and from a handling point of view the problems are enormous:

- 1- CRS systems are not geared and do not have provision for recording passenger's full name, passport numbers and issuing countries, in addition to the phone number of an emergency contact. Development of such systems to cater for such a demand requires a great deal of effort and expenses which the airlines can not afford in the short term, as they are not budgeted for.
- 2- Collecting such information by sales and/or travel agents is far beyond the scope of their obligations and someone has to bear the expenses which ultimately will be passed to the consumer thus making air travel more and more expensive.
- 3- Similarly, obtaining the information at the airport is rather difficult and will cause considerable delays and inevitable congestion at the time when we are striving to introduce the CNS/ATM system, to overcome these problems.
- 4- Likewise, airlines not operating to the USA will not be supporting the NPRM due to the aforementioned difficulties and hence, in case of interline and connecting passengers, it would be a greater problem that may necessitates the revision of MCT (minimum connecting times) thus aggravating existing slot problems.
- 5- Passenger and Ground Handling at most Middle East and European stations are performed by Handling Agents. Hence, it is not possible to secure 100% implementation as the requirements are limited only to travel to the US.

Alternatively and in order to practically accomodate the U.S. requirements, it is suggested that either:


- 1) a procedure be incorporated whereby American Citizens and residents in the USA provide the information upon obtaining a new passport / resident permit or renewing an old one, or

- 2) asking ICAO to introduce a special form for the purpose, to be completed by the passengers and collected by immigration officers at the airport of departure, on the day of travel.

In both cases airlines will provide, a complete Passenger Manifest with list of names only, to the authorities, upon request within 3 hours of an accident.

Thanking you in anticipation.

Yours sincerely,



Abdul Wahab Teffaha
Secretary General

/hh